

**IN THE UNITED STATES DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

<p>THOMAS F. FRIEDBERG & SARAH L. BUNGE,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>DAYBREAK, INC. dba HUBER & ASSOCIATES,</p> <p style="text-align: center;">Defendant.</p>	<p>ACTION NO. 3:19-cv-0053-RAM-EAH</p> <p>JURY TRIAL DEMANDED</p>
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**NOTICE OF OBJECTION TO DEPOSITIOIN NOTICE OF WITNESS CHRIS BUNGE
AND OBJECTION TO REQUEST FOR RECORDS DUCES TECUM**

PLEASE TAKE NOTICE that Plaintiffs hereby object to the Deposition Notice of Witness Chris Bunge on April 24, 2025, at 11:00 am CDT in Worthington, Minnesota, since this date is not available. Defense counsel was advised prior the deposition notice being served that April 24, 2025, was not available due to previously scheduled conflicts with Plaintiffs' counsel. Defense counsel nevertheless served the deposition notice for April 24, 2025. Prior to the deposition notice being served, counsel met and conferred to discuss alternative dates, but defense counsel was not willing to consider alternative dates.

PLEASE TAKE FUTHER NOTICE that Plaintiffs object to the request for records duces tecum since Chris Bunge is not the custodian of records nor does he have records pertaining to the construction of the home at 168 Chocolate Hole. The scope of the records request duces tecum is further objected to since the scope of the documents requested is not proportional to the needs of the case or the issues presented in the breach of contract cause of action.

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Objection to Notice of Deposition and Request for Production

April 17, 2025

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Dated : April 17, 2025

LAW OFFICES OF FRIEDBERG & BUNGE

By: /s/ THOMAS F. FRIEDBERG, ESQ.

THOMAS F. FRIEDBERG, ESQ.(VI#1006)

Attorneys for Plaintiffs THOMAS F.

FRIEDBERG & SARAH L. BUNGE

**THE LAW OFFICES OF FRIEDBERG &
BUNGE**

1005 ROSECRANS STREET, SUITE 202

PO BOX 6814

SAN DIEGO, CALIFORNIA 92166

TEL : (619)557-0101

FAX : (619)557-0560

E-mail : ["tom@lawofficefb.com"](mailto:tom@lawofficefb.com)

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of April 2025, a true and correct copy of **NOTICE OF OBJECTION TO DEPOSITOIN NOTICE OF WITNESS CHRIS BUNGE AND OBJECTION TO REQUEST FOR RECORDS DUCES TECUM** was filed with the CM/ECF system which will provide service to the parties:

Jeffrey C. Cosby, Esq.

Florida Bar No. 967981

Service to: eservice@wlclaw.com

Attorney for Defendant Daybreak Inc

Williams, Leininger & Cosby, P.A.

301 SE Ocean Blvd., Suite 205

Stuart, FL 34994

Telephone: 772-463-8402

Facsimile: 772-463-4820

Andrew C. Simpson

ANDREW C. SIMPSON, PC

2191 Church St., Ste. 5

Christiansted, VI 00820

TEL : 340.719.3900

E-MAIL : asimpson@coralbrief.com

/s/ THOMAS F. FRIEDBERG

THOMAS F. FRIEDBERG